DEPARTMENT OF ENERGY
OAK RIDGE OPERATIONS
OFFICE OF ASSET UTILIZATION, FACILITY AND MATERIAL REUSE DIVISION

AUDIT OF COMMERCIAL MATERIAL PROCESSING FACILITY

1 INTRODUCTION

The Department of Energy (DOE) desires to divest itself of radioactive and potentially radioactive material, scrap metal, and equipment across the DOE complex. Tasks may be issued against this Basic Order Agreement (BOA) by any DOE site in the DOE complex.

DOE has an indefinite amount of radioactive and potentially radioactive material, scrap metal and equipment that needs to be recycled, reused or buried as waste. The material is in the form of small to large pieces of metal, structural steel and other materials such as concrete, equipment and vehicles. The materials are in scrap piles (inside and outside locations), stored in containers and/or may be located within underutilized or abandoned facilities. In some cases the materials may be attached and/or part of the building in which they are located. All of the materials will be reviewed by DOE/DOE contractor, to evaluate concerns with classified, Unclassified Controlled Nuclear Information (UCNI) or Export Controlled Information (ECI). If there are concerns, additional requirements will be identified through the task order issued by the DOE site for that task.

2 OBJECTIVE

The DOE will conduct an audit of the management systems and operational activities/processes at [facility name] on [date(s)]. The objective of the audit will be to verify that the facility and processes available can meet the requirements of DOE contract [number], [date].

3 SCOPE AND LOGISTICS

The audit team consists of the following persons:

[TBD - organization - area of responsibility for this audit]

Specific performance criteria that will be used by auditors during the review are provided below in Section 4. Detailed lines of inquiry are provided in the attachments to this audit plan in the form of checklists and described in Section 5. The checklists are provided to allow facility personnel to gather the required documents and schedule the appropriate meetings, interviews and tours.

A kickoff briefing will be held at the facility on [date] to acquaint the team members with organizational counterparts and to coordinate the activities of the audit. Daily briefings will be held as needed to advise facility management of team findings and observations. An audit closeout meeting will be scheduled at which time the written findings will be provided to the facility management.

4 PERFORMANCE CRITERIA

The facility will be evaluated based on the following performance criteria. However, it should be understood that certain criteria may not apply to each facility audited by DOE. Therefore, only those criteria applicable to each facility, in accordance with the DOE contract and to specific requirements on the awarded task, will be used in the evaluation by the audit team.

4.1 DOE Contract [number], [date]

4.2 Facility Plans and Standard Operating Procedures (SOPs)

4.3 ASME NQA-1, Quality Assurance Program Requirements for Nuclear Facilities

4.4 State/EPA Hazardous Waste TSD Facility Permit

4.5 State Radioactive Material Handling/Storage License

4.6 Solicitation, Offer, Statement of Work, and Award document

4.7 Hazardous Waste Management requirements (EPA and/or State)

4.8 State/EPA permits, licenses, approvals, exemptions, waivers, or authorizations (CAA, CWA, TSCA, RCRA, CERCLA, NPDES)

4.9 Notification of PC Activities, EPA form 7710-53

4.10 Correspondence from regulators and responses/actions regarding noncompliances

4.11 Reports, logs, documentation required to demonstrate compliance as required by any regulatory agency such as PCB annual document logs, inspection records, training records, etc.

5 LINES-OF-INQUIRY (LOI)

The following LOI are intended to be used as a general guide for the conduct of this audit. The LOI are not meant to be all inclusive or restrictive of the areas that the audit team members will review. Other areas of interest will be examined as necessary based on the considered opinion of the auditors. This audit will be conducted under the direction of the Lead Auditor identified in Section 3. The Lead Auditor will decide the ultimate direction necessary for this audit.

5.1 FACILITY AND OPERATIONS OVERVIEW

The effort covered by this BOA consists of the disposition of materials, scrap metal and equipment that may be in open scrap piles, stored in containers, or in a building. DOE/DOE contractors will make the determination if the material has security concerns. If the property/material to be removed/dispositioned under this BOA requires special handling or processing due to classification, UCNI or ECI, specific requirements will be detailed within the individual task orders. It is anticipated that such requirements will be minimal. However, some cases may require destruction or reconfiguration to address the concerns. Should these instances arise, the contractor may propose methods of destruction or reconfiguration for approval by the DOE site issuing the task order. The facility will be evaluated to insure that the operational processes can accommodate the needs and requirements of the DOE contract.

5.2 RADIOACTIVE MATERIALS

Some of the property subject to transfer or the facilities at which the property is located may be contaminated by radiological materials. Therefore, the contractor shall be required to comply with all appropriate DOE Orders and requirements in the performance of all activities taking place at the DOE site. Only minimal decontamination processing will be permitted at the DOE site. It is anticipated that much of the material/equipment that is considered suspect due to prior use/location or that is known to be radioactively contaminated will be transferred off of the DOE site to processing facility licensed by the NRC or an agreement state. Therefore, DOE must insure that such facilities have the appropriate licenses, permits and processes to handle these materials safely, effectively and efficiently.

5.3 ENVIRONMENTAL SAFETY AND HEALTH (ES&H) AND QUALITY ASSURANCE (QA)

The ES&H and QA requirements will vary with each task order depending on the work to be performed. For those activities required to take place on the DOE site, there may be additional requirements based on the issues of concern. Tasks requiring activities to be

performed by the contractor on the DOE site could include such things dismantling, packaging, and loading for shipment. Additionally, the contractor could provide transportation from the DOE site to the contractor facility. If the aforementioned activities are required, there will likely be additional requirements. Any such requirements will be specified by the DOE site on the assigned task order.

However, if the contractor is required to perform no activities at the DOE site and must only accept title to the material at the contractor facility, only the requirements of the contractor facility's permits, licenses, etc. would apply.

5.3.1 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

RCRA was enacted by Congress to prevent contamination of the environment and to protect the public health and welfare from uncontrolled dumping of hazardous wastes. RCRA is intended to prevent pollution at the point of generation to limit the amount being produced and control the disposition of hazardous waste. The regulations promulgated by the Environmental Protection Agency (EPA) to meet the requirements of RCRA appear in 40 Code of Federal Regulations (CFR) 148, 260 - 266, 268, 270 - 273, and 279 - 282. Only those sections applicable to the material and the facility being audited will be evaluated by the audit team.

5.3.2 TOXIC SUBSTANCES CONTROL ACT (TSCA)

TSCA was enacted by Congress to prevent the processing, manufacturing and distribution substances such as PCBs which are known to be harmful to the environment and public health. This audit will primarily focus on PCB handling practices at the facility if applicable. These regulations are specified in 40 CFR 761.

5.3.3 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA)

CERCLA was enacted due to the environmental contamination known to have occurred such as the Love Canal incident. These events were so devastating that Congress felt the need to put a system in place to quickly and effectively handle any release into the environment to mitigate the damages. Therefore, CERCLA handles the contamination after the event has already occurred unlike RCRA which attempts to control waste before generation through disposal. The recently enacted Superfund Recycling Equity Act provides specific requirements for liability to recyclers and generators who send materials such as scrap metal for recycle. The requirements of this act is the primary focus of this audit.

5.3.4 CLEAN AIR ACT (CAA)

For those facilities with air emissions from operations, the audit team will review the requisite permits, exemptions, etc. The audit team will review the parameters monitored in the emissions to insure that all potential contaminants from the DOE material are covered and allowed.

5.3.5 CLEAN WATER ACT (CWA)

Facilities with effluents discharged to a POTW, on-site wastewater treatment or waters of the state, the audit team will review monitoring data and permits to insure that the material to be transferred are allowed under the permits.

5.3.6 QUALITY ASSURANCE (QA)

The ASME NQA-1, Quality Assurance Program Requirements for Nuclear Facilities must be adhered to by those facilities receiving radioactively contaminated materials for DOE sites. The audit team will review procedures, operations and activities to insure the facility's effective implementation of these requirements.

5.3.7 LABORATORY MANAGEMENT

Some facilities have an on-site laboratory that may be used to characterize preshipment samples or to perform required confirmatory analysis under permit conditions, regulations, etc. These laboratories will be evaluated by the audit team for technique and procedure to insure reproducibility of results.

5.3.8 OCCUPATIONAL SAFETY AND HEALTH ACT (OSHA)

The audit team will review procedures and observe activities to determine that an effective program is in place which protects the facility personnel from possible exposure, physical hazards and contamination.